

LAW OFFICES

# ROSEMARIE ARNOLD, LLP

THE PERSONAL INJURY CENTER

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September 8, 2022

**Via Efilng**

Hon. Jessica S. Allen, U.S.M.J.  
United States District Court  
District of New Jersey  
Martin Luther King Jr. Federal Building  
& U.S. Courthouse  
50 Walnut St., #4  
Newark, NJ 07102

**Re: Kataria Ortiz, et al. v. Township of Woodbridge, et al.**  
**Civil Action No.: 2:19-cv-14139**  
**Date of Accident: June 21, 2018**  
**Our File No.: 216355**

Dear Judge Allen:

As you are aware, we represent the plaintiffs in the above-referenced matter. I sought a response from defense counsel Alan Baratz, counsel for the Township of Woodbridge defendants, and Grace Lempka, Esq., counsel for the individual Woodbridge Defendants, prior to submitting this letter without an answer. Please accept the following as plaintiff's status report in anticipation of our conference scheduled for September 12, 2022.

The plaintiff's deposition was originally scheduled for August 24, 2022, at 9:00 am as agreed upon by all parties, and was adjourned by defense counsel Alan Baratz. The deposition of the plaintiff was then rescheduled for September 6, 2022, at 1:00 pm, but was adjourned because the plaintiff unfortunately had to vacate the residence she was renting that had been sold and where she is moving was not ready. Unfortunately, that left her currently living out of an Extended

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Stay Hotel. Moreover, September 6, 2022, was the first day of high school for her daughter and she had to pick her up around 2:30 pm. The defendants, Officers Harris, Bonilla, Jarencizak and Hubner were scheduled for September 7, 2022, and Officer Rastegaraphah on September 8, 2022. All officer's depositions were adjourned by defense counsel because they want to conduct the plaintiff's deposition first.

I will be out of the country to move my daughter into college beginning on September 15<sup>th</sup> and not returning until September 21, 2022.

Counsel makes a joint request for a sixty (60) day extension to complete the party depositions, while extending the dates of the Amended Scheduling Order filed on July 21, 2022, accordingly.

Thank you for your consideration of the foregoing.

Respectfully submitted,  
LAW OFFICE of ROSEMARIE ARNOLD  
*Natalie A. Zammiti Shaw*  
Natalie A. Zammiti Shaw

NZS/LL  
cc: Alan Baratz, Esq. (Via Efilng)  
Grace Lempka, Esq. (Via Efilng)